

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
JOSEPH CARBONE, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Joseph Carbone for Ethicon Wave 1, Dkt. 2025 (motion), 2027 (memorandum in support); and the reply brief filed in Ethicon Wave 3, Dkt. 3036. Plaintiffs respectfully request that the Court exclude Joseph Carbone's testimony, for the reasons expressed in the Wave 1 and Wave 3 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 12, 2018

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Atwood, Jacqueline	2:13-cv-01406
Benson, Kathy Myers	2:16-cv-11679
Endsley, Rebecca Lynne	2:12-cv-09220
Hawk, Pauline S. Latham	2:14-cv-20285
Jenkins, Sarah R.	2:12-cv-04987
Mullins, Lois D.	2:14-cv-26300
Sapp, Renee	2:15-cv-13607
Wilkerson, Barbara	2:16-cv-03282
Williams, Sandy	2:16-cv-03288

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com